

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW MEXICO**

In re:

Chapter 11 Proceedings

SANTA FE MEDICAL GROUP, A
LIMITED LIABILITY COMPANY,
a New Mexico limited liability company,

Debtor.

Case No. 15-11247-11

In re:

ATRINEA RUIDOSO, LLC,
a New Mexico limited liability company,

Debtor.

Case No. 15-11248-11

In re:

ATRINEA HEALTH, LLC,
a New Mexico limited liability company,

Debtor.

Case No. 15-11250-11

In re:

CORAZON FAMILY HEALTH, P.C.,
a New Mexico professional corporation,

Debtor.

Case No. 15-11252-11

**EMERGENCY MOTION FOR (1) JOINT ADMINISTRATION
AND (2) USE OF A CONSOLIDATED CAPTION**

Santa Fe Medical Group, A Limited Liability Company, a New Mexico limited liability company (“SFMG”), and its affiliates Atrinea Ruidoso, LLC, a New Mexico limited liability company (“Atrinea Ruidoso”); Atrinea Health, LLC, a New Mexico limited liability company (“Atrinea Health”); and Corazon Family Health, P.C., a New Mexico professional corporation (“Corazon”) (collectively, the “Debtors”), request that

the Court authorize joint administration of the Debtors' bankruptcy cases and use of a consolidated caption under Bankruptcy Rule 1015 and Local Rule 1015-1.

I. JURISDICTION

The Court has jurisdiction under 28 U.S.C. §§ 157 and 1334. This Motion is a core proceeding under 28 U.S.C. § 157(b)(2)(A) and (O). The relief requested is available under 11 U.S.C. § 105(a), Bankruptcy Rule 1015, and Local Rule 1015-1.

II. MEMORANDUM OF POINTS AND AUTHORITIES.

On May 14, 2015 (the "Petition Date"), the Debtors filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the District of New Mexico (the "Court"). The Debtors are operating their businesses and managing their property as debtors in possession under Bankruptcy Code §§ 1107(a) and 1108.

No trustee or examiner has been appointed, and no official committee of creditors or equity interest holders has yet been established.

The Debtors are affiliates and are regional providers of medical services involving outpatient and urgent care and clinics located throughout New Mexico. Corazon was formed in 2006, SFMG was formed in 1994, Atrinea Health was formed in 2009, and Atrinea Ruidoso was formed in 2013. The principal place of business for the affiliates is Albuquerque, New Mexico and the corporate offices are located in Albuquerque, New Mexico.

...

...

The Debtors' businesses consist primarily of primary/family care, out-patient and urgent care at clinics located throughout New Mexico. As of the Petition Date, the Debtors employ approximately 144 employees. For the twelve-month period ending December 31, 2014, Debtors generated gross revenue of \$15,500,000.00, however, showed a net loss of \$2,000,000.00.

SFMG, Atrinea Ruidoso, Atrinea Health, and Corazon are "affiliates" as that term is defined in Bankruptcy Code § 101(2). The Court is therefore authorized to grant the relief requested in this Motion. The Court previously suggested that joint administration would be approved at a hearing in the bankruptcy filed by the Debtors' parent company that has since been dismissed. The Debtors believe these cases should be jointly administered because the business operations of the companies are interdependent. Entry of an order directing joint administration of these cases will obviate the need for duplicative notices, applications and orders, and thereby save considerable time and expense.

The Debtors request that the following consolidated form of caption be utilized for all pleadings and orders in these cases:

...

...

...

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW MEXICO**

In re:

Chapter 11 Proceedings

SANTA FE MEDICAL GROUP, A
LIMITED LIABILITY COMPANY; ☐
ATRINEA RUIDOSO, LLC; ☐
ATRINEA HEALTH, LLC, ☐
CORAZON FAMILY HEALTH, P.C.; ☐

Case Nos. _____

(Joint Administration)

Debtors.

This filing applies to:

- ☐ All Debtors
- ☐ Specified Debtor(s)

Joint administration of these bankruptcy cases will not result in any prejudice to the Debtors' creditors or other parties in interest. In fact, joint administration is in the best interests of these bankruptcy estates as the vast majority of motions, hearings, and orders in these cases will affect all of the Debtors.

WHEREFORE, the Debtors respectfully request that the Court enter an Order granting the Motion authorizing the relief requested by the Debtors and such other relief as is just and proper.

...

...

...

Dated: May 14, 2015

RESPECTFULLY SUBMITTED,

Scott K. Brown (pro hac vice pending)

Email: sbrown@lrrlaw.com

Telephone: (602) 262-5321

Facsimile (602) 734-3866

Justin J. Henderson (pro hac vice pending)

Email: jhenderson@lrrlaw.com

Telephone: (602) 262-5738

Facsimile (602) 734-3937

LEWIS ROCA ROTHGERBER LLP

201 East Washington Street, Suite 1200

Phoenix, Arizona 85004

-AND-

TAL YOUNG, P.C.

/s/ Steven Tal Young

Steven Tal Young

20 First Plaza NW, Suite 500

Albuquerque, New Mexico 87102

Email: talyoung@yahoo.com

Telephone: (505) 247-0007

Facsimile (505) 764-6099

Proposed Attorneys for Debtors